

UNIVERSITY'S REPLY TO CBG'S RESPONSE TO
STAFF'S CONTENTION XX SUMMARY DISPOSITION MOTION

In its Memorandum and Order of March 4, 1983 the Board directed University and the NRC Staff to respond to the allegation contained in CBG's February 8, 1983 Supplemental Response that UCLA possesses in excess of a formula quantity of strategic special nuclear material. University responds as follows.

I. INTRODUCTION

On April 13, 1981 the Staff filed its "NRC Staff Motion for Summary Disposition" of Contention XX ("Staff's Motion"). CBG's Contention XX alleges that physical security at the UCLA reactor facility is inadequate. The Board deferred consideration of Staff's Motion until July 1982. In its Prehearing Conference Order of July 26, 1982 the Board directed CBG to respond to that portion of Staff's Motion that asserts that "10 CFR Sec. 73.60 is inapplicable to the reactor and that UCLA is not required to take measures against possible sabotage." Prehearing Conference Order, p. 9. On July 21, 1982 the UCLA facility reduced its inventory of Uranium-235 to 4.92 kilograms by shipping off-site a quantity of its unirradiated ("fresh") fuel which had been in storage. This change in inventory was reported to the Board and parties on August 6, 1982. On August 31, 1982 Staff served a handcorrected copy of Staff's Motion to correct for the change in fuel inventory.

"Intervenor Bridge the Gap's Response to NRC Staff's Motion for Summary Disposition as to the Issue of the Applicability of 10 CFR 73.60 and the Need to Protect Against Sabotage" ("CBG's Response") was served September 7, 1982. Subsequently, CBG was given an opportunity to supplement its response. "Intervenor's Supplemental Response to NRC Staff's Motion for Summary Disposition as to the Issue of the Applicability of 10 CFR 73.60 and the Need to Protect Against Sabotage" ("Supplemental Response") was served February 8, 1983.

In its Supplemental Response CBG claims that University has "undercounted" its special nuclear material (SNM) and that "simple arithmetic" shows that the U-235 inventory at the UCLA facility is between 5151 and 5302 grams. Supplemental Response at 6-7. In addition, CBG claims that the facility possesses 160 formula-equivalent grams of Plutonium, consisting of two 32-gram Pu Be start-up sources, for a total SNM inventory of between 5311 and 5462 grams.

CBG is mistaken in these claims. As University demonstrates below (using simple arithmetic), CBG has misread University's inventory records and misinterpreted certain other fuel quantity information to reach erroneous conclusions concerning the quantity of SNM at the UCLA facility.

II. DISCUSSION

A. U-235 Inventory in 1975

Relying on certain "very detailed" inventory records from 1974 and 1975 (Exhibits G and H, respectively, of its Supplemental Response) and two NRC inspection reports from 1978 and 1979 (Exhibit I of its Supplemental Response) CBG claims that the U-235 inventory at the facility in 1975 was either 8849 grams or 9000 grams. Supplemental Response at 6-7. In fact, the U-235 inventory at the UCLA facility at the end of 1975 was 8868 grams (8.87 kg)^{1/} as reported to the Commission in the Material Status Report of December 31, 1975 (Exhibit A, hereof). The several inventory records referenced are easily reconciled.

The "Exhibit G" inventory (reporting 8865.99 grams U-235) expressly states that fuel burn-up for previous years of reactor operation is not taken into account. When burn-up is taken into account (burn-up has been estimated at approximately one (1) gram per operating year) the stated inventory becomes approximately 8849 grams U-235, the same amount stated in the May 20, 1975 NRC Inspection Report (Exhibit H of the Supplemental Response). However, 19 grams must be added to this amount to correspond to a correction made by the facility staff in June 1975. This adjustment

^{1/} Because of round-off errors, the estimate that is made to account for fuel burn-up and other factors, fuel quantity amounts should not be regarded as accurate to more than three significant figures.

reflected a change in the accounting for the "scrap" fuel. With this 19-gram adjustment the 1975 year-end total U-235 inventory was 8.87 kg, which consisted of the following fuel and non-fuel parts: 3.53 kg "in-core" fuel; 3.75 kg "fresh" fuel; 0.74 kg "spent" fuel; 0.59 kg "scrap" fuel; and 0.25 kg uranyl nitrate non-fuel. In addition to the U-235, at the end of 1975 the facility possessed two Pu-Be neutron sources, each containing 32 grams Plutonium.

CBG attempts to deliberately mislead the Board and parties in stating, as it does on page 7 of its Supplemental Response, that: "On October 31, 1978 and October 10, 1979 the NRC inspectors determined that Applicant possessed 9000 grams U-235 plus the two Pu-Be start-up sources" (emphasis added). In fact, as is clear in reading the first sentence on page 3 of the 1978 inspection report (CBG's Exhibit I), that the 9.0 kg of SNM estimated by the NRC inspector included the two 32 gm Pu Be neutron sources (that is, 9.0 kg = approx. 8.87 kg U-235 + 0.16 formula-equivalent grams for the Pu Be sources). The approximations made by the NRC inspector in the 1979 inspection report are also entirely consistent with a total U-235 inventory of 8.87 kg. CBG's use of the 9000 gram amount results in double counting the Pu Be neutron sources.

B. Inventory Changes Since 1975

With respect to inventory changes that have occurred since 1975, CBG relies on a chart provided by University in August of 1982

in response to a CBG interrogatory (Exhibit J of its Supplemental Response) and concludes that the total SNM reduction since 1975 was 3698 grams U-235. However, the conclusion CBG reaches is unwarranted.

CBG's interrogatory and its clarifying request of August 18, 1982 specifically asked University to provide a table of changes in the U-235 fuel inventory. In response University provided the Exhibit J table, which is clearly labelled "Inventory of U-235 Isotope in Fuel, kg." The table does not purport to account for other changes that had occurred in the facility's SNM inventory; that is, changes in non-fuel SNM. In particular, 0.245 kg of Uranyl Nitrate (containing U-235, but not as fuel) was shipped off-site in 1981. In 1982 an additional 0.005 kg of Uranyl Nitrate v disposed of as waste. (The transfer documents for these non-fuel reductions in U-235 appear as Exhibit B hereof.) Finally, in 1982 one of the two Pu-Be neutron sources was transferred from the reactor facility to another unit of the University. (Affidavit of Neill C. Ostrander, attached hereto.)

CBG has overlooked in its simple calculation these other reductions in SNM inventory: 0.25 kg reduction in U-235 (Uranyl Nitrate); and a 32 gram reduction in Plutonium (80 formula-equivalent grams) represented by the transfer of one Pu Be neutron source. The current U-235 inventory can be figured from the 1975 "beginning" inventory of 8.87 kg as follows: 8868 grams less 738 grams ("spent" fuel, 1980), less 595 grams ("scrap" fuel, 1981), less 245 grams

(Uranyl Nitrate, 1981), less 5 grams (Uranyl Nitrate, 1982), less 2355 grams ("fresh fuel, 1982), less 7 grams (fuel burn-up at 1 gm/yr). Since 1975, U-235 inventory has been reduced by a total of 3945 grams, not just the 3698 grams claimed by CBG. The current U-235 inventory is 4.92 kg (8.87 less 3.95 kg). In addition, one Pu-Be source, containing 32 grams Plutonium, has been transferred from the reactor facility site; one Pu-Be source remains at the facility site. (Affidavit of Ostrander.)

C. Exemption for Pu-Be Sealed Sources

In adopting the safeguards upgrade rules applicable to research reactors, which went into effect in November, 1979, the Commission created a specific exemption for Pu-Be sealed sources, provided that the quantities of Plutonium in such sealed sources did not exceed 500 grams. 44 Federal Register at 43280, July 24, 1979. The effect of the exemption is to exclude from the accounting of SNM the quantity of Plutonium contained in such sealed sources. In particular, if a licensee possesses less than 5000 grams of SNM not counting any Plutonium contained in Pu-Be sealed sources, the licensee would be required to comply with 10 CFR Sec. 73.67, but not 10 CFR Sec. 73.60.

The specific Pu-Be sealed source exemption appears in Sec. 73.67(b)(1)(ii). The exemption is not restated in Sec. 73.60, which creates some confusion. However, the Commission's intent to exclude such sealed sources in accounting for SNM to determine which regulation applies is clear in the Federal Register notice of July 24, 1979. Id. Moreover, the fuel accounting practices of

the Commission have consistently been to exclude such sealed sources in determining whether the licensee will be held to the safeguards requirements of Sec. 73.60. The Commission's interpretation of the application of its regulations is entitled to great deference by the Atomic Safety and Licensing Boards. It should also be noted that to adopt a contrary interpretation to these safeguards regulations, holding that a licensee must comply with Sec. 73.60 solely on the basis of an accounting of SNM that included Pu-Be sealed sources at their formula-equivalent weights, would effectively nullify the exemption created in Sec. 73.67.

The UCLA reactor facility currently possesses approximately 4.92 kg of U-235 and one 32-gram Pu-Be sealed source. If this sealed source were accounted for at its formula-equivalent weight (80 grams), University's SNM inventory would be approximately 5.00 kg. In making its inventory changes University has relied on representations made by the Commission staff that the Pu-Be sealed source exemption is applicable to University. In the event the Commission adopts a different interpretation, University will disassemble one of its fuel elements to remove one fuel plate which would be transferred to an off-site location, thereby reducing the SNM inventory to less than 5000 grams under any accounting method.

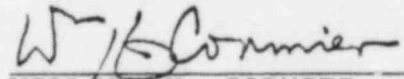
III. CONCLUSION

As explained above and as declared in the affidavit of

Neill C. Ostrander, University currently possesses at its UCLA reactor facility site 4.92 kg of U-235 and a single Pu-Be neutron source containing 32 grams of Plutonium. No genuine factual dispute exists concerning the correctness of these SNM inventory amounts. University respectfully requests that the matter of the applicability of 10 CFR 73.60 be decided at this time.

Dated: March 16, 1983.

DONALD L. REIDHAAR
GLENN R. WOODS
CHRISTINE HELWICK



WILLIAM H. CORMIER
Representing UCLA

U.S. ATOMIC ENERGY COMMISSION
MATERIAL STATUS REPORT

1. NAME & ADDRESS University of California, Los Angeles 405 Hilgard Avenue Los Angeles, California 90024	3. REPORTING IDENTIFICATION SYMBOL (RIS) YEU
	4. REPORT PERIOD 7-1-75 (FROM) 12-31-75 (TO)
2. LICENSE NUMBER(S) R - 71	5. MATERIAL TYPE (SUBMIT SEPARATE REPORT FOR EACH TYPE) Enriched Uranium - U-235

MATERIAL ACCOUNTABILITY

6. QUANTITY BY ELEMENT AND ISOTOPE WEIGHT	A. ELEMENT WT.	B. ISOTOPE WT.
10. BEGINNING INVENTORY	9524	8868
RECEIPTS		
11. PROCUREMENT FROM AEC	None	None
12. PROCUREMENT - RAW MATERIALS	None	None
13. PROCUREMENT - OTHER		
14. DOD RETURNS - USE A		
15. DOD RETURNS - USE B		
16. DOD RETURNS - OTHER USES		
21. PRODUCTION	None	None
22. FROM OTHER MATERIALS	None	None
30. RECEIPTS REPORTED TO AEC ON FORM AEC-741 FROM _____ RIS	None	None
40. TOTAL	9524	8868
REMOVALS		
41. EXPENDED IN SPACE PROGRAMS		
42. SALES TO AEC	None	None
43. SALES TO OTHERS FOR THE ACCOUNT OF AEC	None	None
44. DOD-USE A		
45. DOD-USE B		
46. DOD-OTHER USES		
47. EXPENDED IN AEC TESTS		
48. ROUTINE TESTS		
49. SHIPPER RECEIVER DIFFERENCE		
51. SHIPMENTS REPORTED TO AEC ON FORM AEC-741 TO _____ RIS	None	None
71. DEGRADATION TO OTHER MATERIALS	None	None
72. DECAY	None	None
73. FISSION AND TRANSMUTATION	None	None
74. NORMAL OPERATIONAL LOSSES	None	None
75. ACCIDENTAL LOSSES	None	None
76. APPROVED WRITE-OFFS		
77. MATERIAL UNACCOUNTED FOR	None	None
80. ENDING INVENTORY AEC OWNED	9524	8868
81. ENDING INVENTORY NOT AEC OWNED		
82. TOTAL	9524	8868

(See Reverse Side)

UCC/NRC FORM 741
(7-80) Previous editions are obsolete.
MANDATORY DATA COLLECTION
AUTHORIZED BY 10 CFR 30, 40, 50, 70,
75, 150, Public Laws 83-703, 93-438, 95-91

U.S. DEPARTMENT OF ENERGY AND U.S. NUCLEAR REGULATORY COMMISSION
NUCLEAR MATERIAL TRANSACTION REPORT

1 SHIPPER'S R/S YEU	2 RECEIVER'S R/S FZB	3 TRANSACTION NO 1	4 CORRECTION NO 0	5 PROCESSING CODE SHIPPER	6 RESERVED	7 ACTION CODE RECEIVER	8 DATA CODE	9 DOCUMENTATION (Type of document - 1-1000-SECRET)					
10 A NAME AND ADDRESS OF SHIPPER University of California (SEAS, NEL) 405 Hilgard Avenue Los Angeles, CA 90024 C ATTENTION Neill C. Ostrander D TELEPHONE 213/825-2040		10A NAME AND ADDRESS OF RECEIVER Union Carbide Corporation, Nuclear Division, Y-12 Plant, Bldg. 9720-5 Oak Ridge, TN 37830 C ATTENTION Edward Owings D TELEPHONE 615/574-2580		11 NO OF DATALINES 1-20 21 3		12 NATURE OF TRANSACTION 1-22 B		13 A SHIPPED FOR ACCOUNT OF SAME		14 A SHIPPED TO ACCOUNT OF SAME		15 DISTRIBUTION OF COPIES 1 FZB - YEU 2 FZB 3 FZB - FAA 4 FZB - LAA 5 LAA 6 XAG 7 YEU	
16 EXPORT OR IMPORT TRANSFERS A LICENSE NO 3-22 31 B U.S. PORT EXIT ENTRY 3-22 20				17 MATERIAL TYPE AND DESCRIPTION Unirradiated Scrap (Fuel Plates and Pieces, 93% enriched U-235 alloyed with aluminum). Uranyl nitrate (crystalline) dispersed in talc, 93% enriched U-235 (unirradiated).		18 TRANSPORTATION PROFILE exempt		19 PACKAGE IDENTIFICATION		20 ACTION DATE		21 A MISCELLANEOUS Transfer Authority Letter: DOE (McIntosh-San F. op) to UCLA (Ostrander-NEL) of 3-27-81.	
19 TRANSFER AUTHORITY: CONTRACT, NM DRAFT, OR ORDER NUMBER 1134 601 DE-AS03-76 SF 00034, P.A. DE-ATO3-76 SF 80120 (see Box 21)				22 TOTAL GROSS WEIGHT 457 001 460		23 TOTAL VOLUME (When Transfer Only) 4167 751		B Concise Note Attached Yes <input type="checkbox"/> No <input type="checkbox"/>		C Concise Note Attached Yes <input type="checkbox"/> No <input type="checkbox"/>		MONTH 4 DAY 8 YEAR 81	

LINE NO 20 21 A B	ITEM CHANGE C	IDENTIFICATION (BRANCH NAME) 3-24 381 C	NO OF ITEMS 2140-431 D	PROJECT NUMBER 2144 831 E	MATERIAL TYPE 2156 581 F	COMP. FACILITY CODE G	PROD. CONTROL CODE H I	COUNTRY CONTROL NUMBER 2162 631 J	KEY MEAS POINT 2170 711 K	MEAS IDENT L			GROSS WEIGHT M	NET WEIGHT N	ELEMENT WEIGHT 2182 531 O	ELEMENT LIMIT OR ERROR 2184 581 P	WEIGHT % ISOTOPE 2186 631 Q	ISOTOPE WEIGHT 2187 751 R	TOTAL LIMIT 2189 751 S
										1 RADIO ISOT 2172 711 T	2 IMP 2173 711 U	3 METHOD 2174 711 V							
1		Fuel Plates (Defective)	11		20	B00	A	USUS0000					2640 gms	2640 gms	166 gms	+ 1	93	155 gms	+ 1
2		Scrap (Canned)	4		20	B00	A	USUS0000				3870 gms	3122 gms	473 gms	+ 1	93	440 gms	+ 1	
3		Uranyl Nitrate	1		20	409	A	USUS0000				1207 gms	1105 gms	262 gms	+ 3	93	245 gms	+ 3	
3		(xtal in talc)																	

24 SHIPPER'S DATA
Jack W. Hornor
W. Hornor 4-8-81

25 RECEIVER'S DATA
SIGNATURE OF AUTHORIZED OFFICIAL AND DATE SIGNED (See instructions for procedures regarding certification)

U.S. DEPARTMENT OF ENERGY AND U.S. NUCLEAR REGULATORY COMMISSION
NUCLEAR MATERIAL TRANSACTION REPORT

2E NRC FORM 741

80) Previous editions are obsolete
MANDATORY DATA COLLECTION
AUTHORIZED BY 10 CFR 30.40, 50.70,
5.150, Public Laws 83-701, 93-438, 95-91

SHIPPER'S USE 1. YEU		RECEIVER'S USE 2. LBA		TRANSACTION NO. 3. 00		CORRECTION NO. 4. 00		ACTION CODE 5. A		SHIPPER 6. YEU		RECEIVER 7. LBA		DATA CODE 8. 14		PAGE 9. 1 OF 6		COMES FROM 10. 6	
NAME AND ADDRESS OF SHIPPER University of California (SEAS/NEL) 405 Highland Ave Los Angeles, CA 90024 Attention: Nell C. O'Shannon Telephone: (213) 825-2240 (213) 825-8197				NAME AND ADDRESS OF RECEIVER University of California, Laboratory of Biomolecular & Environmental Science, 400 Veterans Ave, Lehighville, CA, 90024 Attention: Joe Takahashi Telephone: (213) 825-8197				LICENCE NO. 11. R-71				EXEMPT 12. Exempt				NATURE OF TRANSACTION 13. 14 A SHIPPED TO ACCOUNT OF 15. Same			
TRANSFER AUTHORITY: CONTRACT NO. GRANT OR ORDER NUMBER (30480) DE-ASCC-76SF00034, PA: OE-AT03-76SF80120. See Box 21.				MATERIAL TYPE AND DESCRIPTION Unradiated, 93% enriched U-235 as uranyl nitrate dispersed in plaster; 4 pairs and Pb shot.				MISCELLANEOUS Telcom: DOE (McIntosh, S.F. Op) to UCLA (Ashbaugh-NEL) on 8-1-82				U.S. PORT LICENSE NO. (307) 16. 312231				TRANSPORTATION PROFILE 17. A MODEL ID 18. 19 A SHIPPED FOR ACCOUNT OF 20. 21. HCV9 22. 23. 340441 24. 25. 47922 26. 27. 47922 28. 29. 47922 30. 31. 47922 32. 33. 47922 34. 35. 47922 36. 37. 47922 38. 39. 47922 40. 41. 47922 42. 43. 47922 44. 45. 47922 46. 47. 47922 48. 49. 47922 50. 51. 47922 52. 53. 47922 54. 55. 47922 56. 57. 47922 58. 59. 47922 60. 61. 47922 62. 63. 47922 64. 65. 47922 66. 67. 47922 68. 69. 47922 70. 71. 47922 72. 73. 47922 74. 75. 47922 76. 77. 47922 78. 79. 47922 80. 81. 47922 82. 83. 47922 84. 85. 47922 86. 87. 47922 88. 89. 47922 90. 91. 47922 92. 93. 47922 94. 95. 47922 96. 97. 47922 98. 99. 47922 100. 101. 47922 102. 103. 47922 104. 105. 47922 106. 107. 47922 108. 109. 47922 110. 111. 47922 112. 113. 47922 114. 115. 47922 116. 117. 47922 118. 119. 47922 120. 121. 47922 122. 123. 47922 124. 125. 47922 126. 127. 47922 128. 129. 47922 130. 131. 47922 132. 133. 47922 134. 135. 47922 136. 137. 47922 138. 139. 47922 140. 141. 47922 142. 143. 47922 144. 145. 47922 146. 147. 47922 148. 149. 47922 150. 151. 47922 152. 153. 47922 154. 155. 47922 156. 157. 47922 158. 159. 47922 160. 161. 47922 162. 163. 47922 164. 165. 47922 166. 167. 47922 168. 169. 47922 170. 171. 47922 172. 173. 47922 174. 175. 47922 176. 177. 47922 178. 179. 47922 180. 181. 47922 182. 183. 47922 184. 185. 47922 186. 187. 47922 188. 189. 47922 190. 191. 47922 192. 193. 47922 194. 195. 47922 196. 197. 47922 198. 199. 47922 200. 201. 47922 202. 203. 47922 204. 205. 47922 206. 207. 47922 208. 209. 47922 210. 211. 47922 212. 213. 47922 214. 215. 47922 216. 217. 47922 218. 219. 47922 220. 221. 47922 222. 223. 47922 224. 225. 47922 226. 227. 47922 228. 229. 47922 230. 231. 47922 232. 233. 47922 234. 235. 47922 236. 237. 47922 238. 239. 47922 240. 241. 47922 242. 243. 47922 244. 245. 47922 246. 247. 47922 248. 249. 47922 250. 251. 47922 252. 253. 47922 254. 255. 47922 256. 257. 47922 258. 259. 47922 260. 261. 47922 262. 263. 47922 264. 265. 47922 266. 267. 47922 268. 269. 47922 270. 271. 47922 272. 273. 47922 274. 275. 47922 276. 277. 47922 278. 279. 47922 280. 281. 47922 282. 283. 47922 284. 285. 47922 286. 287. 47922 288. 289. 47922 290. 291. 47922 292. 293. 47922 294. 295. 47922 296. 297. 47922 298. 299. 47922 300. 301. 47922 302. 303. 47922 304. 305. 47922 306. 307. 47922 308. 309. 47922 310. 311. 47922 312. 313. 47922 314. 315. 47922 316. 317. 47922 318. 319. 47922 320. 321. 47922 322. 323. 47922 324. 325. 47922 326. 327. 47922 328. 329. 47922 330. 331. 47922 332. 333. 47922 334. 335. 47922 336. 337. 47922 338. 339. 47922 340. 341. 47922 342. 343. 47922 344. 345. 47922 346. 347. 47922 348. 349. 47922 350. 351. 47922 352. 353. 47922 354. 355. 47922 356. 357. 47922 358. 359. 47922 360. 361. 47922 362. 363. 47922 364. 365. 47922 366. 367. 47922 368. 369. 47922 370. 371. 47922 372. 373. 47922 374. 375. 47922 376. 377. 47922 378. 379. 47922 380. 381. 47922 382. 383. 47922 384. 385. 47922 386. 387. 47922 388. 389. 47922 390. 391. 47922 392. 393. 47922 394. 395. 47922 396. 397. 47922 398. 399. 47922 400. 401. 47922 402. 403. 47922 404. 405. 47922 406. 407. 47922 408. 409. 47922 410. 411. 47922 412. 413. 47922 414. 415. 47922 416. 417. 47922 418. 419. 47922 420. 421. 47922 422. 423. 47922 424. 425. 47922 426. 427. 47922 428. 429. 47922 430. 431. 47922 432. 433. 47922 434. 435. 47922 436. 437. 47922 438. 439. 47922 440. 441. 47922 442. 443. 47922 444. 445. 47922 446. 447. 47922 448. 449. 47922 450. 451. 47922 452. 453. 47922 454. 455. 47922 456. 457. 47922 458. 459. 47922 460. 461. 47922 462. 463. 47922 464. 465. 47922 466. 467. 47922 468. 469. 47922 470. 471. 47922 472. 473. 47922 474. 475. 47922 476. 477. 47922 478. 479. 47922 480. 481. 47922 482. 483. 47922 484. 485. 47922 486. 487. 47922 488. 489. 47922 490. 491. 47922 492. 493. 47922 494. 495. 47922 496. 497. 47922 498. 499. 47922 500. 501. 47922 502. 503. 47922 504. 505. 47922 506. 507. 47922 508. 509. 47922 510. 511. 47922 512. 513. 47922 514. 515. 47922 516. 517. 47922 518. 519. 47922 520. 521. 47922 522. 523. 47922 524. 525. 47922 526. 527. 47922 528. 529. 47922 530. 531. 47922 532. 533. 47922 534. 535. 47922 536. 537. 47922 538. 539. 47922 540. 541. 47922 542. 543. 47922 544. 545. 47922 546. 547. 47922 548. 549. 47922 550. 551. 47922 552. 553. 47922 554. 555. 47922 556. 557. 47922 558. 559. 47922 560. 561. 47922 562. 563. 47922 564. 565. 47922 566. 567. 47922 568. 569. 47922 570. 571. 47922 572. 573. 47922 574. 575. 47922 576. 577. 47922 578. 579. 47922 580. 581. 47922 582. 583. 47922 584. 585. 47922 586. 587. 47922 588. 589. 47922 590. 591. 47922 592. 593. 47922 594. 595. 47922 596. 597. 47922 598. 599. 47922 600. 601. 47922 602. 603. 47922 604. 605. 47922 606. 607. 47922 608. 609. 47922 610. 611. 47922 612. 613. 47922 614. 615. 47922 616. 617. 47922 618. 619. 47922 620. 621. 47922 622. 623. 47922 624. 625. 47922 626. 627. 47922 628. 629. 47922 630. 631. 47922 632. 633. 47922 634. 635. 47922 636. 637. 47922 638. 639. 47922 640. 641. 47922 642. 643. 47922 644. 645. 47922 646. 647. 47922 648. 649. 47922 650. 651. 47922 652. 653. 47922 654. 655. 47922 656. 657. 47922 658. 659. 47922 660. 661. 47922 662. 663. 47922 664. 665. 47922 666. 667. 47922 668. 669. 47922 670. 671. 47922 672. 673. 47922 674. 675. 47922 676. 677. 47922 678. 679. 47922 680. 681. 47922 682. 683. 47922 684. 685. 47922 686. 687. 47922 688. 689. 47922 690. 691. 47922 692. 693. 47922 694. 695. 47922 696. 697. 47922 698. 699. 47922 700. 701. 47922 702. 703. 47922 704. 705. 47922 706. 707. 47922 708. 709. 47922 710. 711. 47922 712. 713. 47922 714. 715. 47922 716. 717. 47922 718. 719. 47922 720. 721. 47922 722. 723. 47922 724. 725. 47922 726. 727. 47922 728. 729. 47922 730. 731. 47922 732. 733. 47922 734. 735. 47922 736. 737. 47922 738. 739. 47922 740. 741. 47922 742. 743. 47922 744. 745. 47922 746. 747. 47922 748. 749. 47922 750. 751. 47922 752. 753. 47922 754. 755. 47922 756. 757. 47922 758. 759. 47922 760. 761. 47922 762. 763. 47922 764. 765. 47922 766. 767. 47922 768. 769. 47922 770. 771. 47922 772. 773. 47922 774. 775. 47922 776. 777. 47922 778. 779. 47922 780. 781. 47922 782. 783. 47922 784. 785. 47922 786. 787. 47922 788. 789. 47922 790. 791. 47922 792. 793. 47922 794. 795. 47922 796. 797. 47922 798. 799. 47922 800. 801. 47922 802. 803. 47922 804. 805. 47922 806. 807. 47922 808. 809. 47922 810. 811. 47922 812. 813. 47922 814. 815. 47922 816. 817. 47922 818. 819. 47922 820. 821. 47922 822. 823. 47922 824. 825. 47922 826. 827. 47922 828. 829. 47922 830. 831. 47922 832. 833. 47922 834. 835. 47922 836. 837. 47922 838. 839. 47922 840. 841. 47922 842. 843. 47922 844. 845. 47922 846. 847. 47922 848. 849. 47922 850. 851. 47922 852. 853. 47922 854. 855. 47922 856. 857. 47922 858. 859. 47922 860. 861. 47922 862. 863. 47922 864. 865. 47922 866. 867. 47922 868. 869. 47922 870. 871. 47922 872. 873. 47922 874. 875. 47922 876. 877. 47922 878. 879. 47922 880. 881. 47922 882. 883. 47922 884. 885. 47922 886. 887. 47922 888. 889. 47922 890. 891. 47922 892. 893. 47922 894. 895. 47922 896. 897. 47922 898. 899. 47922 900. 901. 47922 902. 903. 47922 904. 905. 47922 906. 907. 47922 908. 909. 47922 910. 911. 47922 912. 913. 47922 914. 915. 47922 916. 917. 47922 918. 919. 47922 920. 921. 47922 922. 923. 47922 924. 925. 47922 926. 927. 47922 928. 929. 47922 930. 931. 47922 932. 933. 47922 934. 935. 47922 936. 937. 47922 938. 939. 47922 940. 941. 47922 942. 943. 47922 944. 945. 47922 946. 947. 47922 948. 949. 47922 950. 951. 47922 952. 953. 47922 954. 955. 47922 956. 957. 47922 958. 959. 47922 960. 961. 47922 962. 963. 47922 964. 965. 47922 966. 967. 47922 968. 969. 47922 970. 971. 47922 972. 973. 47922 974. 975. 47922 976. 977. 47922 978. 979. 47922 980. 981. 47922 982. 983. 47922 984. 985. 47922 986. 987. 47922 988. 989. 47922 990. 991. 47922 992. 993. 47922 994. 995. 47922 996. 997. 47922 998. 999. 47922 1000. 1001. 47922 1002. 1003. 47922 1004. 1005. 47922 1006. 1007. 47922 1008. 1009. 47922 1010. 1011. 47922 1012. 1013. 47922 1014. 1015. 47922 1016. 1017. 47922 1018. 1019. 47922 1020. 1021. 47922 1022. 1023. 47922 1024. 1025. 47922 1026. 1027. 47922 1028. 1029. 47922 1030. 1031. 47922 1032. 1033. 47922 1034. 1035. 47922 1036. 1037. 47922 1038. 1039. 47922 1040. 1041. 47922 1042. 1043. 47922 1044. 1045. 47922 1046. 1047. 47922 1048. 1049. 47922 1050. 1051. 47922 1052. 1053. 47922 1054. 1055. 47922 1056. 1057. 47922 1058. 1059. 47922 1060. 1061. 47922 1062. 1063. 47922 1064. 1065. 47922 1066. 1067. 47922 1068. 1069. 47922 1070. 1071. 47922 1072. 1073. 47922 1074. 1075. 47922 1076. 1077. 47922 1078. 1079. 47922 1080. 1081. 47922 1082. 1083. 47922 1084. 1085. 47922 1086. 1087. 47922 1088. 1089. 47922 1090. 1091. 47922 1092. 1093. 47922 1094. 1095. 47922 1096. 1097. 47922 1098. 1099. 47922 1100. 1101. 47922 1102. 1103. 47922 1104. 1105. 47922 1106. 1107. 47922 1108. 1109. 47922 1110. 1111. 47922 1112. 1113. 47922 1114. 1115. 47922 1116. 1117. 47922 1118. 1119. 47922 1120. 1121. 47922 1122. 1123. 47922 1124. 1125. 47922 1126. 1127. 47922 1128. 1129. 47922 1130. 1131. 47922 1132. 1133. 47922 1134. 1135. 47922 1136. 1137. 47922 1138. 1139. 47922 1140. 1141. 47922 1142. 1143. 47922 1144. 1145. 47922 1146. 1147. 47922 1148. 1149. 47922 1150. 1151. 47922 1152. 1153. 47922 1154. 1155. 47922 1156. 1157. 47922 1158. 1159. 47922 1160. 1161. 47922 1162. 1163. 47922 1164. 1165. 47922 1166. 1167. 47922 1168. 1169. 47922 1170. 1171. 47922 1172. 1173. 47922 1174. 1175. 47922 1176. 1177. 47922 1178. 1179. 47922 1180. 1181. 47922 1182. 1183. 47922 1184. 1185. 47922 1186. 1187. 47922 1188. 1189. 47922 1190. 1191. 47922 1192. 1193. 47922 1194. 1195. 47922 1196. 1197. 47922 1198. 1199. 47922 1200. 1201. 47922 1202. 1203. 47922 1204. 1205. 47922 1206. 1207. 47922 1208. 1209. 47922 1210. 1211. 47922 1212. 1213. 47922 1214. 1215. 47922 1216. 1217. 47922 1218. 1219. 47922 1220. 1221. 47922 1222. 1223. 47922 1224. 1225. 47922 1226. 1227. 47922 1228. 1229. 47922 1230. 1231. 47922 1232. 1233. 47922 1234. 1235. 47922 1236. 1237. 47922 1238. 1239. 47922 1240. 1241. 47922 1242. 1243. 47922 1244. 1245. 47922 1246. 1247. 47922 1248. 1249. 47922 1250. 1251. 47922 1252. 1253. 47922 1254. 1255. 47922 1256. 1257. 47922 1258. 1259. 47922 1260. 1261. 47922 1262. 1263. 47922 1264. 1265. 47922 1266. 1267. 47922 1268. 1269. 47922 1270. 1271. 47922 1272. 1273. 47922 1274. 1275. 47922 1276. 1277. 47922 1278. 1279. 47922 1280. 1281. 47922 1282. 1283. 47922 1284. 1285. 47922 1286. 1287. 47922 1288. 1289. 47922 1290. 1291. 47922 1292. 1293. 47922 1294. 1295. 47922 1296. 1297. 47922 1298. 1299. 47922 1300. 1301. 47922 1302. 1303. 47922 1304. 1305. 47922 1306. 1307. 47922 1308. 1309. 47922 1310. 1311. 47922 1312. 1313. 47922 1314. 1315. 47922 1316. 1317. 47922 1318. 1319. 47922 1320. 1321. 47922 1322. 1323. 47922 			

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
THE REGENTS OF THE UNIVERSITY)
OF CALIFORNIA)
(UCLA Research Reactor))

Docket No. 50-142
(Proposed Renewal of Facility
License Number R-71)

AFFIDAVIT OF NEILL C. OSTRANDER

I, Neill C. Ostrander, do depose and state:

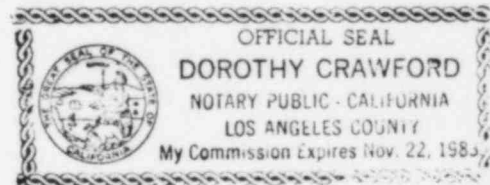
- 1) I am the Manager of the Nuclear Energy Laboratory (NEL) at UCLA.
- 2) On July 22, 1982 a single 32-gram PuBe sealed source, licensed under NRC License SNM-974 was physically transferred from the reactor facility by representatives of the Radiation Safety Office to their calibration building remote from the reactor site to be used as a calibration source under the custody of the campus Radiation Safety Officer.
- 3) The quantity of SNM currently possessed by the NEL consists of the following: approximately 4.92 kilograms Uranium-235 and one 32-gram PuBe sealed source. I swear that the foregoing is true and correct to the best of my knowledge and belief.

Neill C. Ostrander
Neill C. Ostrander

Subscribed and sworn to before me
this 16th day of March, 1983.

Dorothy Crawford
Notary Public 3-16-83

My Commission Expires: 11-27-83



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
THE REGENTS OF THE UNIVERSITY) Docket No. 50-142
OF CALIFORNIA) (Proposed Renewal of Facility
) License Number R-71)
)
(UCLA Research Reactor))

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached: UNIVERSITY'S
REPLY TO CBG'S RESPONSE TO STAFF'S CONTENTION XX SUMMARY
DISPOSITION MOTION

in the above-captioned proceeding have been served on the following
by deposit in the United States mail, first class, postage prepaid,
addressed as indicated, on this date: March 16, 1982.

John H. Frye, III, Chairman
Administrative Judge
ATOMIC SAFETY AND LICENSING BOARD
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Emmeth A. Luebke
Administrative Judge
ATOMIC SAFETY AND LICENSING BOARD
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
ATOMIC SAFETY AND LICENSING BOARD
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Counsel for the NRC Staff
OFFICE OF THE EXECUTIVE LEGAL DIRECTOR
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Chief, Docketing and Service Section
OFFICE OF THE SECRETARY
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

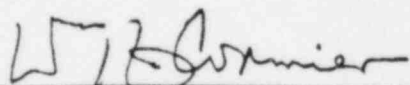
Mr. Daniel Hirsch
Cte. to Bridge the Gap
1637 Butler Avenue, #203
Los Angeles, CA 90025

Mr. John Bay, Esq.
3755 Divisadero #203
San Francisco, CA 94123

Mr. Daniel Hirsch
Box 1186
Ben Lomond, CA 95005

Nuclear Law Center
c/o Dorothy Thompson
6300 Wilshire Blvd., #1200
Los Angeles, CA 90048

Ms. Lynn G. Naliboff
Deputy City Attorney
City Hall
1685 Main Street
Santa Monica, CA 90401



WILLIAM H. CORMIER
UCLA Representative

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA